

Bruce L. Simon (Bar No. 96241)  
**PEARSON, SIMON & WARSHAW, LLP**  
44 Montgomery Street, Suite 2450  
San Francisco, California 94104  
Telephone: (415) 433-9000  
Facsimile: (415) 433-9008  
Email: bsimon@pswlaw.com

Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

DEBRA SLEDGE, JOAN SLEDGE, KATHY  
SLEDGE LIGHTFOOT, and KIM SLEDGE  
ALLEN, jointly d/b/a "SISTER SLEDGE";  
RONEE BLAKLEY; and GARY WRIGHT,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

WARNER MUSIC GROUP CORP.,

Defendant.

CASE NO. CV 12-0559-RS

**CLASS ACTION**

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO SHORTEN TIME ON  
HEARING FOR PLAINTIFFS'  
UNOPPOSED MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL FOR  
PLAINTIFFS DEBRA SLEDGE, JOAN  
SLEDGE, AND KIM SLEDGE ALLEN**

Judge: Hon. Richard Seeborg

PEARSON, SIMON & WARSHAW, LLP  
44 MONTGOMERY STREET, SUITE 2450  
SAN FRANCISCO, CALIFORNIA 94104

1 Plaintiffs and Defendant hereby enter the following Joint Stipulation and [Proposed] Order  
2 to Shorten Time on the Hearing for Plaintiffs' Unopposed Motion for Leave to Withdraw as  
3 Counsel for Plaintiffs Debra Sledge, Joan Sledge, and Kim Sledge Allen ("Motion to Withdraw"):

4 WHEREAS, Plaintiffs filed their unopposed Motion to Withdraw on December 5, 2013  
5 with a noticed hearing date of January 9, 2014 (Dkt. 82);

6 WHEREAS, the parties do not expect any opposition or reply to the Motion to Withdraw;

7 WHEREAS, on August 31, 2012, this Court granted a stay of the proceedings to allow the  
8 parties to participate in settlement discussions, which stay has been extended through December  
9 12, 2013;

10 WHEREAS, over the course of this time, the parties have diligently participated in  
11 settlement negotiations, and while they have not reached a settlement at this juncture, the  
12 negotiations are constructive and progress has been made. All parties are committed to continuing  
13 the settlement discussions at this time;

14 WHEREAS, to the extent settlement can be reached, the parties would hope to obtain an  
15 order granting preliminary approval of any settlement by February 1, 2014, so that notice of the  
16 settlement could be disseminated to class members with Defendant's next mailing cycle of royalty  
17 statements;

18 WHEREAS, to the extent settlement can be reached, failure to send notice in that mailing  
19 cycle could result in a delay of six months or more in providing notice to the class and cause  
20 further delay;

21 WHEREAS, the Motion to Withdraw must be addressed by the Court before settlement  
22 can be reached or any motion for preliminary approval filed;

23 WHEREAS, this request for an order shortening time will not have a negative effect on the  
24 schedule for the case since this Court has stayed proceedings to allow the parties to participate in  
25 settlement negotiations;

26 WHEREAS, there is already a Case Management Conference scheduled in this case for  
27 December 12, 2013, at 10:00 am.

28 PURSUANT TO CIVIL LOCAL RULE 6-2, THE PARTIES HEREBY STIPULATE that

the hearing, if any, on Plaintiffs' unopposed Motion to Withdraw shall be heard on December 12, 2013, at 1:30 p.m.

**IT IS SO STIPULATED.**

DATED: December 5, 2013

Respectfully Submitted,

By: /s/ Daniel L. Warshaw

Daniel L. Warshaw

**PEARSON, SIMON & WARSHAW, LLP**

*Interim Lead Counsel Representative for Plaintiffs*

DATED: December 5, 2013

Respectfully Submitted,

By: /s/ Tamerlin J. Godley

Tamerlin J. Godley

**MUNGER, TOLLES & OLSON LLP**

*Attorneys for Defendant Warner Music Group Corp.*

Filer's Attestation

I, Daniel L. Warshaw, am the ECF user whose identification and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER TO SHORTEN TIME ON HEARING FOR PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS DEBRA SLEDGE, JOAN SLEDGE, AND KIM SLEDGE ALLEN. I hereby attest that the counsel listed above concur in this filing.

DATED: December 5, 2013

/s/ Daniel L. Warshaw

Daniel L. Warshaw

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 Dated: 12/9/13



Honorable Richard Seeborg  
United States District Court Judge

PEARSON, SIMON & WARSHAW, LLP  
44 MONTGOMERY STREET, SUITE 2450  
SAN FRANCISCO, CALIFORNIA 94104